

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT of TENNESSEE  
at CHATTANOOGA

FILED

2016 MAY -3 P 1:12

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 ROBERT R. DOGGART )

1:15-cr-39

Judge Collier  
Magistrate Judge Lee

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**Solicitation to Commit a Civil Rights Violation**

The Grand Jury charges that, beginning in or about February, 2015, and continuing until in or about April, 2015, in the Eastern District of Tennessee and elsewhere, the defendant, ROBERT R. DOGGART, with the intent that another person or persons engage in conduct constituting a felony that has as an element the use, attempted use, and threatened use of physical force against the person and property of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce, and endeavor to persuade such other person and persons to engage in such conduct, that is, in and affecting interstate and foreign commerce, through the use, attempted use, and threatened use of a dangerous weapon, explosives, and fire, to intentionally damage and destroy religious real property, and attempt to do so, because of the religious character of that property, that is, a mosque in the state of New York; all in violation of Title 18, United States Code, Section 247(a)(1) and Title 18, United States Code, Section 373.

**COUNT TWO**

**Solicitation to Commit Arson of a Building**

The Grand Jury charges that, beginning in or about February, 2015, and continuing until in or about April, 2015, in the Eastern District of Tennessee and elsewhere, the defendant, ROBERT R. DOGGART, with the intent that another person or persons engage in conduct constituting a felony that has as an element the use, attempted use, and threatened use of physical force against the person and property of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and endeavor to persuade such other person and persons to engage in such conduct, that is, to maliciously damage and destroy, and attempt to damage and destroy, by means of fire and explosive, any building and other real and personal property used in interstate and foreign commerce, that is, a mosque in Hancock, New York; all in violation of Title 18, United States Code, Section 844(i) and Title 18, United States Code, Section 373.

**COUNT THREE**

**Threat in Interstate Commerce**

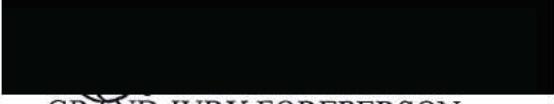
The Grand Jury charges on or about March 22, 2015, in the Eastern District of Tennessee and elsewhere, the defendant, ROBERT R. DOGGART, through the use of a telephone and other instruments of interstate commerce, did willfully make a threat to kill, injure and intimidate any individual and to unlawfully damage and destroy a building and other real and personal property by means of fire and an explosive; all in violation of Title 18, United States Code, Section 844(e).

**COUNT FOUR**

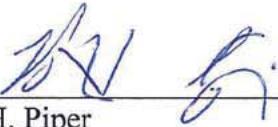
**Threat in Interstate Commerce**

The Grand Jury charges on or about April 9, 2015, in the Eastern District of Tennessee and elsewhere, the defendant, ROBERT R. DOGGART, through the use of a telephone and other instruments of interstate commerce, did willfully make a threat to kill, injure and intimidate any individual and to unlawfully damage and destroy a building and other real and personal property by means of fire and an explosive; all in violation of Title 18, United States Code, Section 844(e).

A TRUE BILL:

  
GRAND JURY FOREPERSON

NANCY STALLARD HARR  
Acting United States Attorney

By:   
Perry H. Piper  
Assistant United States Attorney

By:   
Saeed A. Mody  
Trial Attorney  
Civil Rights Division